

1 GEORGE P. KELESIS, ESQ.
Nevada Bar No. 000069
2 COOK & KELESIS, ESQ.
517 S. 9th Street
3 Las Vegas, NV 89101
Phone: (702) 737-7702
4 Fax: (702) 737-77012
law@bckltd.com
5 Attorneys for Defendant RAMON DESAGE

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7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA
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10
11 UNITED STATES OF AMERICA,)
12 Plaintiff,)
13 vs.)
14 RAMON DESAGE,)
15 Defendant.)
16

Case No.: 2:13-cr-00039-JAD-VCF

STIPULATION AND PROPOSED
ORDER TO EXTEND DEADLINE
FOR DEFENDANT TO PRODUCE
EXPERT REPORTS

17 It is hereby stipulated and agreed, by and between Dayle Elieson, United States
18 Attorney, through Patrick Burns, Assistant United States Attorney, and George P. Kelesis,
19 Esq., counsel for defendant Ramon Desage, that Defendant's deadline for the production
20 of his expert witness reports for the restitution hearing in this matter be extended one (1)
21 day, until November 5, 2018.

22 This stipulation is entered for the following reasons:

- 23 1. Defendant's experts are in the process of compiling the relevant back-up
24 documents for their reports from the voluminous discovery produced in the
25 matter.
26 2. This brief extension is not sought for the purposes of delay, but to allow
27 defense counsel adequate time to review the final reports in conjunction
28 with the supporting documentation.

3. This is the first request for an extension of time regarding the Defendant's production of expert reports.

DATED this 2nd day of November, 2018.

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA
3

4 UNITED STATES OF AMERICA,)

5 Plaintiff,)

6 vs.)

7 RAMON DESAGE,)

8 Defendant.)
9

Case No.: 2:13-cr-00039-JAD-VCF

10 **FINDINGS OF FACT**

11 Based on the Stipulation of counsel, and good cause appearing therefor, the Court
12 finds that:

- 13 1. Defendant's experts are in the process of compiling the relevant back-up
14 documents for their reports from the voluminous discovery produced in the
15 matter.
- 16 2. This brief extension is not sought for the purposes of delay, but to allow
17 defense counsel adequate time to review the final reports in conjunction
18 with the supporting documentation.
- 19 3. This is the first request for an extension of time regarding the Defendant's
20 production of expert reports.
- 21 4. Denial of this request for an extension could result in a miscarriage of
22 justice.

23 **CONCLUSIONS OF LAW**

- 24 5. For all of the above-stated reasons, there exists good case for, and the ends
25 of justice would be served best by, a continuance for the production of
26 Defendants Notice of Witnesses and Reports for Restitution Hearing.
27
28

ORDER

IT IS HEREBY ORDERED that the deadline for the Defendant's production of expert reports for the restitution hearing be extended to November 5, 2018.

DATED: 11/6/2018

Nunc Pro Tunc: 11/2/2018


HONORABLE JENNIFER A. DORSEY
UNITED STATES DISTRICT JUDGE